

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE RANBAXY GENERIC DRUG
APPLICATION ANTITRUST
LITIGATION

THIS DOCUMENT RELATES TO:

ALL DIRECT PURCHASER ACTIONS

Master File No. 19-md-02878-NMG

**DECLARATION OF THOMAS M. SOBOL IN SUPPORT OF DIRECT PURCHASER
CLASS PLAINTIFFS' MOTION FOR ENTRY OF AN ORDER APPROVING THE
FORM AND MANNER OF NOTICE, APPOINTING A NOTICE ADMINISTRATOR,
AND FORMALLY APPOINTING CLASS REPRESENTATIVES
AND LEAD CLASS COUNSEL**

I, Thomas M. Sobol, hereby declare as follows:

1. I am a member of the bar of the Supreme Judicial Court of the Commonwealth of Massachusetts and of the United States District Court for the District of Massachusetts. I am the managing partner of the Boston office of Hagens Berman Sobol Shapiro LLP and counsel for plaintiffs Meijer, Inc. and Meijer Distribution, Inc. in this matter. I submit this declaration in support of Direct Purchaser Class Plaintiffs' Motion for Entry of an Order Approving the Form and Manner of Notice, Appointing a Notice Administrator, and Formally Appointing Class Representatives and Lead Class Counsel.

2. Attached as Exhibit 1 is a list of the members of the Diovan, Nexium, and Valcyte direct purchaser classes.

3. Attached as Exhibit 2 is a proposed notice to be sent directly via first-class U.S. mail to each member of the direct purchaser classes.

4. Attached as Exhibit 3 is a true and correct copy of the antitrust litigation notice approved by the court in *In re Nexium (Esomeprazole) Antitrust Litig.*, No. 12-md-2409 (D. Mass. Dec. 27, 2013), ECF No. 714-2.

5. Attached as Exhibit 4 is a true and correct copy of the antitrust litigation notice approved by the court in *In re Solodyn (Minocycline Hydrochloride) Antitrust Litig.*, No. 14-md-2503 (D. Mass. Dec. 20, 2017), ECF No. 872.

6. Attached as Exhibit 5 is a true and correct copy of the antitrust litigation notice approved by the court in *In re Loestrin 24 Fe Antitrust Litig.*, No. 13-md-2472 (D.R.I. Aug. 14, 2019), ECF No. 1200.

7. Attached as Exhibit 6 is a true and correct copy of the antitrust litigation notice approved by the court in *In re Intuniv Antitrust Litig.*, No. 16-cv-12653 (D. Mass. Dec. 23, 2019), ECF No. 396-1.

8. Attached as Exhibit 7 is a true and correct copy of the antitrust settlement notice approved by the court in *In re Restasis (Cyclosporine Ophthalmic Emulsion) Antitrust Litig.*, No. 18-md-2819 (E.D. N.Y. May 15, 2020), ECF No. 507-1.

9. Attached as Exhibit 8 is a true and correct copy of the RICO settlement notice approved by the court in *In re Neurontin Marketing, Sales Practices, & Products Liability Litig.*, No. 04-cv-10981 (D. Mass. May 30, 2014), ECF No. 4260-1.

10. Attached as Exhibit 9 is a true and correct copy of the antitrust and RICO litigation notice approved by the court in *In re EpiPen (Epinephrine Injection, USP) Marketing, Sales Practices and Antitrust Litig.*, No. 17-md-2785 (D. Kan. Aug. 31, 2020), ECF No. 2209-3.

Executed this 6th day of August 2021, under the pains and penalties of perjury.

/s/ Thomas M. Sobol
Thomas M. Sobol
Hagens Berman Sobol Shapiro LLP

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